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November 4, 2020

BY ECF

Hon. Mary Kay Vyskocil
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007

USDC SDNY
DOCUMENT
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Re: U.S. v. Martinez (MKV)
20 Cr. 213

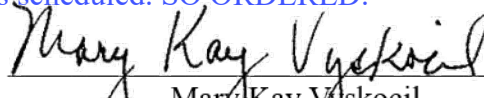
Dear Judge Vyskocil,

I represent Victor Martinez in the above captioned case. He is currently out on bond, with one of the conditions being that his travel is restricted to the Eastern and Southern Districts of New York. As the court is aware, Mr. Martinez's mother suffered two strokes on October 1, 2020. Mr. Martinez traveled there for one week with the court's approval. Ms. Martinez is recovering from those strokes in Boston, Massachusetts and Mr. Martinez would like to continue to visit her. I am writing to respectfully request that Mr. Martinez's bail conditions be modified to allow him to travel to Boston, Massachusetts to visit his mother Jeanine Martinez upon advance notice to Pretrial Services


I have spoken to the Government who take no position but defer to Pretrial Services. Mr. Martinez's Pretrial officer Ms. Piperato has no objection to this request if Mr. Martinez provides her with the address where he will be staying and continues to check in with her weekly.

GRANTED. Mr. Martinez's bail conditions are modified to permit him to travel to Boston, Massachusetts for the purpose of visiting his mother, provided that he notifies Pretrial Services of the travel at least 24 hours in advance, provides to Pretrial Services the address where he will be staying and any contact information for him at that address, and continues to check in with his Pretrial Services Officer as scheduled. **SO ORDERED.**

Date: 11/9/2020
New York, New York


Mary Kay Vyskocil
United States District Judge

Respectfully Submitted,


Christine Delince, Esq.